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May 12, 2020

Honorable William H. Pauley, III
United States District Judge
500 Pearl Street
New York, New York 10007

Re: United States v. Sanchez, et al., 19 Cr. 820
(WHP)

Applications granted. Sentencing
adjourned to July 16, 2020 at 2:30
p.m. Bond continued and deadline
adjusted as requested.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

May 13, 2020

Dear Judge Pauley:

I write with the consent from the Government to respectfully request that sentencing in the above-entitled case currently scheduled for June 11, 2020 be continued for approximately 30 days. Additionally, the Government consents to extend the time for the defense to file objections to the Pre-Sentence Report ("PSR") for 2 weeks. Finally, for the reasons stated herein the parties jointly request the Court to continue Mr. Sanchez's current bond conditions until the date of his sentencing.

As of this date the local federal jails including the MDC, where Mr. Sanchez was incarcerated continue to be in lock down status in response to the Covid-19 pandemic. The dangerous conditions at the MDC and other local jails persist. By now it almost goes without saying that we should not be adding to the prison population during the COVID-19 pandemic if it can be avoided. Several recent court rulings have explained the health risks—to inmates, guards, and the community at large—created by large prison populations. See, e.g., *United States v. Stephens*, No. 15-cr-95-AJN, 2020 WL 1295155, at *2 (S.D.N.Y. Mar. 19, 2020); *United States v. Barkman*, No. 3:19-cr-0052-RCJ, 2020 U.S. Dist. LEXIS 45628 (D. Nev. Mar. 17, 2020); *In the Matter of Extradition of Toledo Manrique*, No. 3:19-mj-71055-MAG-1 (TSH), 2020 WL 1307109 (N.D. Cal. Mar. 19, 2020). Additionally, undersigned counsel has been limited in her ability to meet with Mr. Sanchez and to obtain mitigating documentation concerning Mr. Sanchez's upcoming sentencing and to properly address issues raised in the PSR.

Based on the foregoing, the government consents that the Court adjourn Mr. Sanchez's sentencing date for 30 days, the defense needs two additional weeks to file objections to Mr. Sanchez's PSR and the parties are jointly requesting that Mr. Sanchez be continued on the current terms of release as set forth in this Court's previous order dated March 30, 2020 (ECF Doc. 30) until Mr. Sanchez's sentencing date so long as he continues to be in compliance with the conditions of his pre-trial supervision.

Respectfully submitted,

/S/

Paula J. Notari